

Exhibit 1
Affidavit of Facts of Roger D. King

AFFIDAVIT OF FACTS

STATE OF Kentucky)
COUNTY OF Kenton) SS:
)

The undersigned, Roger D. King, being first duly sworn and cautioned states as follows:

1. The facts contained in this Affidavit are of my own personal knowledge. I am competent to testify in open court as to the facts contained in this Affidavit.
2. I am a United States citizen and resident of Florida.
3. I am an insider in the skilled nursing care industry in Ohio and have been involved in the industry since at least 1989.
4. Since 1995, I have served as the President of the Academy of Senior Health Sciences, Inc., a trade association representing the interests of its members (namely skilled nursing facilities operating in Ohio). The Academy is comprised of more than 300 Ohio skilled nursing facilities.
5. In 1989, I founded Carington Health Systems and oversaw the expansion of the company from two Ohio skilled nursing facilities to thirty-four Ohio skilled nursing facilities before selling the company in 2004.
6. Since 1989, I have founded, developed, and operated various companies that provide services to Ohio skilled nursing facilities:
 - a. I founded Poly-Care Services in 1992 and developed the company into a statewide mobile oxygen provider before selling the company in 1995.
 - b. I founded LP Services in 1992 and developed the company into a statewide pharmacy before selling the company to Omnicare in 1995.
 - c. I founded Strategic Nursing Systems, Inc. in 1992. Strategic Nursing Systems offered consultation and clinical management services to Ohio skilled nursing facilities. Affiant sold the company in 2004.
 - d. I founded Care-Med, Inc. in 2002. Care-Med distributed medical supplies to skilled nursing facilities in Ohio, Indiana, and Pennsylvania before I sold it to McKesson in 2007.
 - e. I founded Therapy Alliance, LLC in 2003 and developed the company into a statewide licensed therapy provider before selling the company in 2011.

- f. I founded Ohio Ambulance Systems, LLC in 2008. Ohio Ambulance Systems provides emergency and non-emergency transportation on behalf of skilled nursing facilities in Cleveland, Columbus, Cincinnati, and other areas in Ohio. I have sold this company.
- g. I founded One Source, LLC in 2008. One Source is a professional employment agency which provides self funding options for Ohio workers compensation to Ohio skilled nursing facilities and related entities.

7. I have direct and independent knowledge of the information on which the allegations are based because of my activity in and knowledge of the Ohio skilled nursing care industry.

8. I am the original source of the information, because I discovered information on which the allegations in this Complaint are based through my own private investigations.

9. I received information that OhioHealth Corporation ("OhioHealth") was creating and implementing the OhioHealth Skilled Nursing Facility Continuing Care Network ("OhioHealth SNF Network") and chose to investigate the network.

10. As an insider in the Ohio skilled nursing care industry, I requested and was able to attain private information (documents and otherwise) from various skilled nursing facilities in the Columbus, Ohio area regarding the OhioHealth SNF Network. Some of the skilled nursing facilities that provided information to me were selected to participate in the OhioHealth SNF Network and some were not. I continued to gather information regarding the OhioHealth SNF Network after the network launched on March 1, 2014.

11. Based upon my investigation, I discovered that the OhioHealth SNF Network was designed to result in (and now operates as) a scheme where OhioHealth exclusively refers patients in need of skilled nursing care to the sixteen (16) skilled nursing facilities that comprise the OhioHealth SNF Network and in exchange, those sixteen (16) skilled nursing facilities exclusively refer patients to OhioHealth for services outside the scope of skilled nursing care, provide valuable extraordinary services to OhioHealth, and absorb various costs that OhioHealth would otherwise absorb.

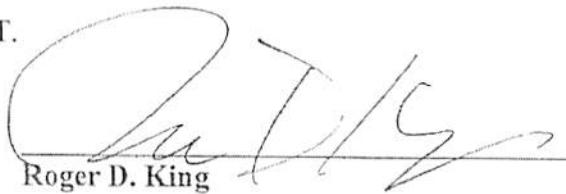
12. Upon investigation, I discovered, among other things, all of the documents which the allegations in the Complaint are based, including without limitation, the following: (i) Preliminary Expectations for OhioHealth Skilled Nursing Facility (SNF) Continuing Care Network (CCN), (ii) the OhioHealth SNF Survey Form, (iii) Credentialing Criteria for OhioHealth Skilled Nursing Facility (SNF) Continuing Care Network (CCN), (iv) the Continuing Care Network Skilled Nursing Facility Provider Agreement (Clinical Integration), and (v) the

OhioHealth Skilled Nursing Facility (SNF) Continuing Care Network (CCN) Handbook of Quality Requirements (collectively hereinafter the "Documents").

13. The Documents are not public knowledge.
14. Additionally, I spoke with various administrators, owners, and other individuals in power in the skilled nursing care industry in the Columbus, Ohio area regarding the OhioHealth SNF Network. Multiple individuals have indicated that Kelly Belcher, Program Manager for the OhioHealth SNF Network, assured them that OhioHealth's discharge planners would direct and steer at least ninety percent (90%) of Medicare patients seeking skilled nursing care to the skilled nursing facilities in the OhioHealth SNF Network. The individuals further indicated that Ms. Belcher represented that OhioHealth demanded patients discharged from the skilled nursing facilities in the OhioHealth SNF Network to be referred back to OhioHealth and entities associated with OhioHealth for services outside the scope of skilled nursing care.
15. Skilled nursing facilities are afraid to come forward and speak-out against OhioHealth regarding their demands for remunerations in exchange for referrals, because they fear OhioHealth's retaliation.
16. I have standing to bring this action because my knowledge of the OhioHealth SNF Network is not based on public information, but instead private information that could only be accessed because of my position as an insider in Ohio skilled nursing care industry.

[Signature Page to Follow]

FURTHER AFFIANT SAYETH NAUGHT.



Roger D. King

I hereby certify that the forgoing Affidavit was subscribed and sworn to me in person by Roger D. King, on behalf of himself, before me, a notary public on this 10th day of April, 2015.



AMY L. NEGLEY
Notary Public, Kentucky
State At Large
My Commission Expires
July 9, 2017
Notary ID# 490566

Notary Public

